

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND

FILED  
U.S. DISTRICT COURT  
DISTRICT OF MARYLAND

Laura Akers

\*

8113 Beverly Road

Severn MD 21144

*(Full name and address of the plaintiff)*

**Plaintiff(s)**

vs.

\*

Anne Arundel County Department of Social Service

C/O Jonathon Hodgson County Attorney

Heritage Complex 2660 Riva Road 4th Floor

Annapolis MD 21401

*(Full name and address of the defendant(s))*

**Defendant(s)**

\*

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2011 SEP -6 P 2:43

CLERK'S OFFICE  
AT BALTIMORE

BY \_\_\_\_\_ DEPUTY

Civil No.:

*(Leave blank. To be filled in by Court.)*

**JKB 11 CV 2490**

and Noreen Stant  
and David Ladd

\*

**COMPLAINT**

1. Jurisdiction in this case is based on:

☐

Diversity (none of the defendants are residents of the state where plaintiff is a resident)

☒

Federal question (suit is based upon a federal statute or provision of the United States Constitution)

☒

Other (explain) Freedom of Information Act

2. The facts of this case are:

On September 7th, 2010 The Defendant/ Anne Arundel County Department of Social Services fabricated evidence against the Complainant. Defendant withheld true facts of information about Complainant. Defendant failed to protect Complainant's minor daughter Ashley's Constitutional Rights. Defendant improperly investigated and closed reports about Complainant's minor daughter 'Ashley'. Defendant failed to notify the Circuit Court Judge on September 7th, 2010 of David Keith Brashears criminal history. Complainant accuses the Defendant of Gross Misconduct and Neglect. Complainant accuses Defendant of acting improperly because of a Conflict of Legal Interest.

3. The relief I want the court to order is:

- ☒ Damages in the amount of: Two Million Dollars
- ☒ An injunction ordering: Any illegal, fraudulent and improper reports about Complainant be destroyed.
- ☐ Other (explain) \_\_\_\_\_

6/6/2011  
(Date)

Laura Akers  
(Signature)

Laura Akers

8113 Beverly Road

Severn MD 21144

\_\_\_\_\_  
(Printed name, address and phone number of Plaintiff)

#### **Privacy Rules and Judicial Conference Privacy Policy**

Under the E-Government Act and Judicial Conference policy, any paper filed with the court should not contain an individual's social security number, full birth date, or home address; the full name of person known to be a minor; or a complete financial account number. These rules address the privacy concerns resulting from public access to electronic case files.

Perjury Defamation of Character, Slander, Gross Misconduct, and Negligence

1. Co Defendant/ Department of Social Services allegedly submitted false records for the Circuit Court Custody Evaluator" Katherine Nutile" and Defendant/ Mr.

Wallingsford at the September 7<sup>th</sup> 2010 hearing that Complainant was found to have previously abused all three of her adult children when they were small.

2. The Custody Evaluator testified under oath on September 7<sup>th</sup> 2010 that the Department of Social Services had records indicating that child abuse occurred by the Complainant/ Ms. Akers against William, Kristin and Ryan when they were little.

Complainant is accusing Malicious Perjury by the Co-Defendant/ Department of Social Services, and Defendant/Mr. Wallingsford. The only abuse report indicated was for Complainant's daughter "Kristin" back in 2003 and Complainant already testified to this incident in 2003 during a Custody trial that she accidentally scratched Kristin's cheek during an argument with her daughter while Complainant was pointing her finger at her daughter Kristin about the police being called to the Complainant's work because Kristin was caught stealing merchandise at the Lucky's convenience store.

This alleged abuse was without doubt an accident that Complainant already apologized to Kristin for and was laid to rest years ago.

3. Furthermore, Complainant is alleging that Co-Defendant/ Anne Arundel County Department of Social Services and The Circuit Court Custody evaluator failed to report to the Judge during the hearing on September 7<sup>th</sup> 2010 two reports the Complainant filed on behalf of Ashley of Complainant noticing large purple bruises on Ashley's face when the child was returned back to Complainant's care after being on

Defendant/ Mr. Wallingsford's Custody time.

4. Complainant strongly feels that Co-Defendant/ Anne Arundel County department of Social Services prematurely closed the Sexual touching investigation of Ashley at the hearing on September 7<sup>th</sup> 2010. Complainant called the Co- Defendant/ Anne Arundel County department of Social Services and spoke to a Social worker named Noreen Startt one week after the hearing on September 7<sup>th</sup> 2010 because Complainant received a letter from Ms. Startt in the mail about the Sexual touching report being officially closed. Complainant told Ms. Startt that Defendant/ Mr. Wallingsford was still sending Ashley to David Brashear's and Wendy Owen's home to be babysat overnight. Ashley said that she was still sleeping in Mr. Brashear's bed and Complainant knew that Ashley had no room of her own to sleep in. To Complainant's shock and anger Ms. Startt replied "that it is not against the law for a two year old child to sleep in an adult's bed overnight". Complainant demanded that Co- Defendant/ Anne Arundel County Department of Social Services stop Defendant/ Mr. Wallingsford from sending Ashley to this couples home and that Defendant was violating a new Court Order by doing so.

5. Complainant told Ms Startt that The Circuit Court Custody Evaluator testified on September 7<sup>th</sup> 2010 that Ashley had a bedroom of her own while staying in the Complainant's home and Complainant asked Ms. Startt why this couple was not required to have a separate bedroom for Ashley to sleep in. Ms. Startt replied to Complainant "I wouldn't send Ashley there if it was up to me. Complainant slammed the phone down hanging up the call.

6. Complainant is asking to include Co- Defendant/The Anne Arundel County Department of Social Services in her Complaint against Defendant/ Mr. Wallingsford. Complainant is asking that any fraudulent Social Services Reports of Child Abuse of her and her children be disclosed in a Court of law and ordered by a Judge to be destroyed. Any Alleged Fraudulent Child abuse Reports that Complainant is unaware of and found to be innocent of should have been destroyed after two years. Any such Fraudulent Reports of Alleged Child Abuse from the Anne Arundel County Department of Social Services that Complainant is unaware of and was some how forwarded to and Disclosed by the Circuit Court Custody evaluator on September 7<sup>th</sup> 2010 is Illegal, Perjury, Slander and Defamation of Character. Complainant is dumbfounded and Unaware of where and how all these so called Reports from the anne Arundel County Department of Social services of her abusing her grown children when they were little that were testified to at the September 7<sup>th</sup> 2010 hearing by The Circuit Court Custody Evaluator and Mr. Wallingsford came from. Furthermore Defendant and Co- Defendant are without question Committing Perjury. There are no such Social Services Records in existence that say or even acknowledge that William and Ryan were removed from Custody of Complainant for Alleged Child abuse that she has ever been aware of.

7. Co- Defendant/The Anne Arundel County department of Social Services along with The Custody evaluator did not notify the Judge on September 7<sup>th</sup> 2010 that Reports were investigated regarding Ashley against Mr. Wallingsford. Although the Reports were closed, they should not have been destroyed for two years. Co- defendants/ The Anne Arundel County Department of Social Services definitely knew about the Reports and so did the Custody Evaluator. On September 7<sup>th</sup> 2010 the Court was told no reports were

found against the Defendant. Complainant is also seeking the Court to deem Co-Defendant Anne Arundel County Department of Social Services to be liable of Perjury and Slander and Disclosing False Reports in a Court of Law and included in the 10 Million Dollar Judgment for Illegal Conduct and Emotional Stress they caused the Complainant.

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Respectfully Submitted

Laura Akers

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6/6/2011